

PC:CSK/LXN  
F.#2008R01875

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

U.S. DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
★ JAN 20 2012 ★  
BROOKLYN OFFICE

UNITED STATES OF AMERICA

- against -

CECILIA CHANG,

Defendant.

S T I P U L A T E D  
P R O T E C T I V E  
O R D E R

11 CR 0067 (S-1) (SJ)

- - - - -X

Pursuant to Federal Rule of Criminal Procedure 16(d), it is hereby stipulated and agreed by and between the United States of America, by Assistant United States Attorneys Charles Kleinberg and Lan Nguyen, and the defendant Cecilia Chang, by John Nicholas Iannuzzi, Esq., that this Order shall govern production of Confidential Material, as that term is defined below, to the defendant and her counsel, and the Court Orders as follows:

Definitions

1. Certain terms as used in this Order shall be defined as follows:

a. The "Defense" shall mean the undersigned defendant ("Defendant"), counsel of record for the Defendant ("Defense Counsel"), additional attorneys, paralegal(s) and other personnel assisting Defense Counsel and experts retained by or on

behalf of the Defendant, including translators or interpreters (the "Retained Experts").

b. "Personal Identification Information" shall mean information that uniquely identifies a single individual. Personal Identification Information includes, but is not limited to, information concerning an individual's date of birth, social security number, alien number, mailing address, income tax information, and banking account, credit card account and other financial information.

Production of Confidential Material

2. The United States has previously produced and will produce in discovery copies of materials, both in electronic and paper format, containing Personal Identification Information (the "Confidential Material").

3. Except as authorized in paragraphs 6, 7, 9, and 10, the Defense shall not create notes containing Personal Identification Information or print or copy the Confidential Material.

Inspection by Defense Counsel

4. Before Defense Counsel may have access to the Confidential Material, Defense Counsel must sign a copy of this Order, and by doing so, acknowledge that he has read, understands and is bound by the terms of this Order. Defense Counsel shall file the signed copy of the Order by ECF. Any additional

attorneys, paralegals, Retained Experts, or other personnel assisting Defense Counsel must read this Order, sign the attached Acknowledgment, and file the executed Acknowledgment by ECF before having access to the Confidential Material.

5. Defense Counsel may inspect the Confidential Material, subject to the terms and conditions of this Order.

6. Defense Counsel may take notes concerning any of the Confidential Material, but any notes that specifically copy Personal Identification Information must be stored at the office of Defense Counsel or the office of the Retained Experts in a locked room or on one or more password-protected computers. Upon the conclusion of the criminal case pending against Defendant and any subsequent appeals, Defense Counsel shall shred or delete any notes containing Personal Identification Information.

7. Defense Counsel may print paper copies of records, documents and files contained in the Confidential Material that may assist Defense Counsel in connection with this case (including investigation, trial preparation, plea negotiations, trial, and appeal). All such records, documents and files printed by the Defense shall be stored in a locked safe at the office of Defense Counsel or the office of Retained Experts (including translators and/or interpreters) when not being used by the Defense in preparation for trial, and shall be shredded by

Defense Counsel upon the conclusion of the criminal case pending against Defendant and any subsequent appeals.

Inspection by Defendant

8. Before having access to Confidential Material, the Defendant must sign a copy of this Order, and by doing so, acknowledge that she has read, understands and is bound by the terms of this Order. Defense Counsel shall file the Order signed by the Defendant by ECF.

9. Defendant may access the Confidential Material solely for the purpose of assisting Defense Counsel in the preparation of her defense and only in the presence of Defense Counsel whose access has been authorized by this Order. Defendant may make notes while accessing the Confidential Material, but must at the end of every preparation session turn over these notes to Defense Counsel who will be responsible for retaining them in the manner discussed above in paragraph 6. The Defendant may not make or retain copies of any notes relating to Confidential Material.

Use and Maintenance of the Confidential Material by the Defense

10. The Defense shall use and maintain the Confidential Material including any copies or notes as follows:

a. The Defense shall use the Confidential Material solely and exclusively in connection with this case (including, but not limited to, investigation, trial preparation,

plea negotiations, trial, and appeal), and not for any commercial or other purpose.

b. In no event shall the Defense disclose any of the Personal Identification Information to any other person or entity other than the government or this Court. Pleadings containing or attaching Personal Identification Information shall be filed under seal, or redacted in accordance with Fed. R. Crim. P. 49.1.

11. Defense Counsel shall promptly notify the Court and the United States in writing if the contents of any

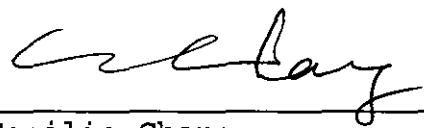
Confidential Material are disclosed either intentionally or unintentionally to anyone not authorized by this Order or further order of the Court.

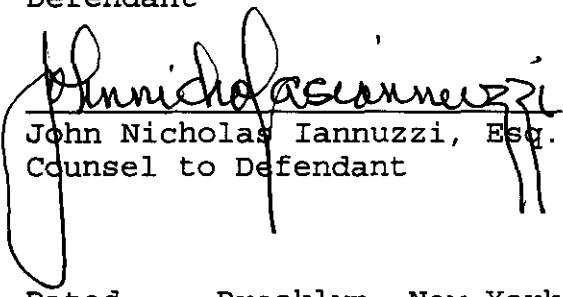
Dated: Brooklyn, New York  
January 19, 2012

LORETTA E. LYNCH  
United States Attorney  
Eastern District of New York

By: 

Charles S. Kleinberg  
Lan Nguyen  
Assistant United States Attorneys

  
Cecilia Chang  
Defendant

  
John Nicholas Iannuzzi, Esq.  
Counsel to Defendant

Dated: Brooklyn, New York  
January \_\_, 2012

SO ORDERED,

/s/(SJ)

  
THE HONORABLE STERLING JOHNSON, JR.  
UNITED STATES DISTRICT JUDGE